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Of Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

DR. RUPA BALA, Plaintiff, v. **OREGON HEALTH AND SCIENCE UNIVERSITY, an Oregon public corporation; DR. CHARLES HENRIKSON, an individual; DR. JOAQUIN CIGARROA, an individual.** Defendants.	**CASE NO. 3:18-CV-00850-HZ** **PLAINTIFF'S SECOND PROPOSED SPECIAL JURY INSTRUCTION**

      Plaintiff requests the following jury instruction to be given in the case. Plaintiff provided

this to Defendants yesterday evening and does not know Defendants' position on the instruction.

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PLAINTIFF'S REQUESTED JURY INSTRUCTION NO. 5A

Evidence For A Limited Purpose

Some evidence may be admitted only for a limited purpose.

When I instruct you that an item of evidence has been admitted only for a limited purpose, you must consider it only for that limited purpose and not for any other purpose.

The evidence received last week regarding the Plaintiff's employment with Banner Medical was admitted for a limited purpose. You may consider this evidence only to evaluate Defendants' mitigation of damages defense and to address the credibility of Plaintiff's position that her Banner termination was a "no cause" termination. The evidence received last week regarding Plaintiff's employment with University of Pennsylvania was also admitted for a limited purpose. You may consider this evidence only to show potential bias as to Plaintiff's retained expert witness, Lisa Broten.

You may not consider this evidence to decide liability for discrimination or retaliation.

9th Circuit Model Civil Instruction 1.11 (modified)

DATED This 23rd Day of April, 2024

MATTHEW C. ELLIS, PC

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JURY INSTRUCTION**